

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re: )  
 ) Bankruptcy Case No. 08-35653-KRH  
CIRCUIT CITY STORES, INC., et al., ) Jointly Administered  
 ) Chapter 11  
Debtors. ) Hon. Kevin R. Huennekens  
 )

**MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE**

Neil E. McCullagh moves this Court for an Order permitting Michael J. Reynolds (“Mr. Reynolds”) to represent PNY Technologies, Inc. (“PNY Technologies”), *pro hac vice* in the above-styled bankruptcy cases and any related adversary litigation and in support of his Motion states as follows:

1. I am a member in good standing of the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with Mr. Reynolds in this matter. My business address and bar number are as follows:

Neil E. McCullagh (VSB #39027)  
Spotts Fain PC  
411 E. Franklin Street, Suite 600  
Richmond, VA 23219

2. Mr. Reynolds is a member in good standing of the Bar of the State of New York, as well as the Bar of the State of New Jersey, and is admitted to practice before the United States District Courts for the District of New Jersey, the Eastern and Southern Districts of New York, as well as the United States Court of Appeals for the Third Circuit. His business address is as follows:

Neil M. McCullagh, Esquire (VSB #39027)  
Jennifer J. West, Esquire (VSB #47522)  
Erin E. Kessel, Esquire (VSB #65360)  
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Tel: (804) 697-2000 Fax: (804) 697-2100  
Counsel for PNY Technologies, Inc.

McCarter & English, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102

3. Mr. Reynolds has not been the subject of disciplinary action by the Bar or courts of the State of New York, or any other state or any Federal Court.

4. Mr. Reynolds has not been denied admission to the courts of any state or to any federal court.

5. Mr. Reynolds is familiar with the Federal Rules of Civil Procedure. He will become familiar with and at all times abide by the Local Rules of this Court and comply with those Rules so long as this cause is pending.

6. Mr. Reynolds respectfully requests that he be allowed to appear before this Court to represent the interests of PNY Technologies.

WHEREFORE, Neil E. McCullagh prays that this Court grant his Motion to permit Michael J. Reynolds to represent PNY Technologies, *pro hac vice* in this action, to shorten the notice period required pursuant to Rule 9013-1 for such Motion, and for such other and further relief as this Court deems just and proper.

PNY TECHNOLOGIES, INC.

By: /s/ Neil E. McCullagh  
Counsel

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Counsel for PNY Technologies, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion was served by U.S. Mail, First Class, postage prepaid or electronic means on this the 6th day of October, 2010 to the following constituting all necessary parties:

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/s/ Neil E. McCullagh